

EXHIBIT A

Michel Baumeister

From: Michel Baumeister
Sent: Friday, March 22, 2019 4:56 PM
To: Patricia Ryan
Cc: Kathy Maher
Subject: Re: Clarification re: email

PRIVILEGED AND CONFIDENTIAL

Dear Patty and Kathy,

After 17 years of successful representation of both of you and your children, I don't know how we've gotten to this point where your anger at the USVSST Fund compensating your other family members has somehow been transferred to me and my firm. This cycle of back and forth emails is counterproductive and really highlights the communication problems we are having. Trust and communication between an attorney and his or her client are critical components of a positive working relationship. Over the last few months both of these elements have suffered, and that is why I believe both of you would be better served immediately with a new attorney.

Again, I mention the Kreindler and Motley firms since they would be able to represent both of you and your children in the terrorist action pending in the Southern District of New York, which is the only lawsuit you presently have pending and for which you need an attorney. Remember, the terrorist action was undertaken by us on your behalf as a moral commitment to combat terrorism. I believe that this is an extraordinarily difficult lawsuit to win, although I should note that other lawyers have a more optimistic view about the lawsuit's success. Nevertheless, we have invested thousands of hours and hundreds of thousands of dollars on behalf of you and our other clients to continue this fight.

In addition, you seem to want to challenge the statute under which the USVSST Fund was established years ago and through which thousands of terrorist victims have received compensation. I am unaware of a specialist attorney who is experienced in APA litigation who would undertake this challenge for any claimant who has received an award under the original VCF or any claimant who participated in the Zadroga Fund. Nevertheless, you mention that you were told that the Kreindler firm and/or the Motley firm might be interested in this endeavor. I have been told just the opposite, but if they are interested and if you retain either firm, they would be able to represent you in the terrorist action and any new litigation under the APA. That seems to be the path you would prefer given your statements in the past emails. We would certainly cooperate and communicate with your new lawyers as needed.

Since your emails over the last several months continue to question the actions we have taken on your behalf and the legal advice we have given you concerning the original VCF, and in the filing and pursuit of your individual claims and responsibilities under the USVSST Fund, it appears our attorney-client open communication and trust that I have valued over the years, has broken down. When this happens, it affects an attorney's ability to properly represent his or her client. Therefore, I believe that you should immediately seek out and retain an attorney that would serve both of you and your children in the terrorist action and any new litigation you believe would be appropriate. I am both saddened and disappointed that our relationship has come to this – I truly wish both of you and your children all the best in the future.

Sincerely,

Mitch Baumeister

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